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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)

WESTERN MASSACHUSETTS ELECTRIC COMPANY ) DTE 00-40

)

PETITION OF WESTERN MASSACHUSETTS INDUSTRIAL CUSTOMERS GROUP

FOR LEAVE TO INTERVENE AS A FULL PARTICIPANT

Now come General Electric Company, Mead Corporation, Schweitzer-Mauduit International, Inc. (formerly Kimberly-Clark Corporation) and Solution, Inc. (formerly Monsanto Company) ("Western Massachusetts Industrial Customers Group" or "WMICG") and hereby petition for leave to intervene in the proceeding docketed as DTE -00-40 concerning the Application of Western Massachusetts Electric Company ("WMECo") for Approval of Rate Reduction Bonds under the terms of the Electric Restructuring Act, St. 1997, c. 164.

(1) WMICG members are customers of Western Massachusetts Electric Light Company and purchase large amounts of electricity and distribution service under various tariff rates of WMECo including rates T-2 and PR and special contracts on file with the Department of Public Utilities, now known as the Department of Telecommunications and Energy ("Department"). The member include General Electric Company, a New York Corporation with a principal executive office in Fairfield, Connecticut. The Plastics Division has its world headquarters in Pittsfield, Massachusetts; Mead Corporation, an Ohio corporation with headquarters in Dayton Ohio. The Specialty Papers Division of Mead Corporation has a plant in South Lee, Massachusetts; Schweitzer-Mauduit International, Inc., a Delaware corporation with a principal executive office in Alpharetta, Georgia. It has a paper plant in Lee, Massachusetts; and

Solutia Inc., a Delaware corporation with a principal executive office in St. Louis, Missouri. Solutia owns and operates a chemical plant in Indian Orchard section of Springfield, Massachusetts.

(2) WMICG has been permitted to intervene on behalf of its members and has actively participated in numerous rate, fuel charge and energy efficiency charges proceedings involving WMECo, including without limitation the Electric Restructuring Plan Filing in DTE 97-120. WMICG has filed an appeal from the Final Order in DTE 97-120 currently pending before the Supreme Judicial Court in General Electric Company, et al v. Department of Telecommunications and Energy, SJ-1999-0574. WMICG has an ongoing interest in continuing its participation in the present proceeding to make sure that the transition costs pledged to secure the proposed electric rate reduction bonds will not exceed the amount of transition costs that will be recoverable following a final decision of the Court in favor of the WMICG position in the Appeal.

(3) The interests of WMICG is not and will not be adequately represented by the Attorney General, which represents many small electric customers or other intervenors in this proceeding who have in the past represented interests adverse to

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or different from WMICG.

(4) The participation of WMICG in this proceeding will include a full review of the amount of transition costs required to be pledged to secure the bonds and make sure that ratepayers will not be saddled with additional transition costs to secure the bonds as a result of the issuance of a financing order in this docket.

Respectfully submitted,

GENERAL ELECTRIC COMPANY,

MEAD CORPORATION,

SCHWEITZER-MAUDUIT INTERNATIONAL,

INC., and

SOLUTION, INC.

by their attorneys,

Andrew J. Newman, BBO #370340

Rubin and Rudman LLP

50 Rowes Wharf

Boston, MA 02110

617 - 330-7031

Date: May 24, 2000

CERTIFICATE OF SERVICE

DTE 00-40

I hereby certify that I have this day served the foregoing document upon all parties of record in these proceedings in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Procedure and Practice).

Andrew J. Newman

Date: May 24, 2000

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